

Electric Power Supply Association

Advocating the power of competition

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January 10, 2003

The Honorable Spencer Abraham Secretary U.S. Department of Energy 1000 Independence Avenue, S.W. Washington, D.C. 20585

Dear Mr. Secretary:

We appreciate this opportunity to update you on the progress competitive power suppliers have made in reducing greenhouse gas emissions from the electricity sector. The contributions the competitive power sector has made, and will continue to make in the years ahead, will assist in achieving the Administration's goal of significantly reducing greenhouse gas (GHG) intensity over the next decade.

The Electric Power Supply Association (EPSA) is the national trade association representing competitive power suppliers, including independent power producers, merchant generators and power marketers. These suppliers provide reliable, competitively priced electricity from environmentally responsible facilities in the U.S. and global power markets. Over the past two decades, competitive generators have led the nation in the efficient production of cleaner and lower cost electricity.

The competitive power industry accounts for over 36 percent of the nation's installed generating capacity, and the majority of new power projects coming online today. These existing and proposed facilities represent the most efficient generating units in operation.

The competitive power sector provides many benefits to the nation's economy and environment; these benefits will increase with the expansion and maturation of wholesale electric competition. The Department of Energy and the Environmental Protection Agency predicted that competition in the electricity sector would provide incentives to generators to improve efficiencies at existing facilities, develop efficient newer facilities, and create new markets for green power and end-use efficiency services, all of which reduce greenhouse gas emissions and costs. To date, the introduction of competition into the wholesale electricity market has resulted in

¹ Department of Energy and Environmental Protection Agency. Carbon Emissions from the Generation of Electric Power in the United States, July 2000. Internet site at: http://www.eia.doe.gov/cneaf/electricity/page/co2_report/co2report.html.

greater operating efficiency, widespread technological advances and improved customer service, contributing to approximately \$13 billion in customer savings.² This also translates into significant environmental benefits by supplanting the use of more expensive, less efficient and higher emitting power plants. However, in order to fully realize the environmental benefits that the competitive power sector can provide, more needs to be done.

As competitive suppliers increase their share of total U.S. generation, CO₂ emission rates will continue to decline. That is because EPSA member companies' new plants currently operate at levels that are approximately half the national average fossil fuel CO₂ emissions rate.³ As competition expands within the wholesale power markets, utilization of highly efficient base load generating technology will increase and these new plants will contribute to a dramatic decrease in the overall greenhouse gas intensity of the electricity sector. Competitive markets also provide incentives to operate older facilities in a more efficient manner. Furthermore, from an energy diversity perspective, competitive wholesale generation includes a diverse mix of fuel sources and technologies.

Competitive power suppliers support President Bush's objective of reducing the greenhouse gas intensity of the U.S. economy by 2012 and believe that increasing the use of competitive power generation is key to meeting President Bush's goal. Under the Energy Information Administration's "business-as-usual" electricity forecast, which was used as supporting information for the President's Global Climate Change Initiatives announced in February 2002, clean energy sources are responsible for decreasing greenhouse gas intensity of fossil fuel generation by 10 percent over the next 10 years. To meet this forecast these energy sources will need to more than double the amount of power they generate today. This is a significant challenge, but one the competitive power sector is intent on meeting.

Opportunities exist for competitive power suppliers to further reduce greenhouse gas intensity beyond EIA's "business-as-usual" forecasts. For example, EIA currently projects these clean energy sources to operate at a 40 percent average capacity factor in the year 2012. By increasing the utilization of these facilities to a 44 percent average capacity factor in the year 2012, nearly an additional 100 million tons of CO₂ emissions could be avoided. This reduction alone would meet about 23 percent of the President's overall economy-wide goal.

EPSA member companies are committed to utilizing this generation capacity to the fullest extent possible and will work diligently to advance and implement policies that achieve this goal. This includes supporting efforts to expand wholesale electric

⁵ Ibid.

² DOE's National Transmission Grid Study modeled the Nation's electricity industry and found that customers are already receiving \$13 billion per year in benefits from wholesale power competition.

³ Platts Research Consulting study.

⁴ Energy Information Agency, *Annual Energy Outlook 2002*, December 2001, Internet site at: http://www.eia.doe.gov/oiaf/archive/aeo02/index.html.

competition and rationalize regulations, such as the Federal Energy Regulatory Commission's standard electric market design and Regional Transmission Organization initiatives; advance market-based multi-emissions legislation; streamline current regulatory programs; and seek better disclosure and market transparency.

Finally, in many cases individual EPSA members have made additional pledges to help reduce greenhouse gas emissions. Examples of such projects include reforestation projects in the U.S. and overseas, rural solar electrification, methane reduction, carbon sequestration research and development and support for other voluntary reduction initiatives such as the Chicago Climate Exchange.

EPSA is pleased to do our part in support of President Bush's goal of reducing greenhouse gas intensity. I look forward to joining you at the upcoming ceremony where industry initiatives on reducing emissions will be formally presented.

Sincerely,

Lynne H. Church

Finnett Church

President

cc: The Honorable James Connaughton

Chairman, White House Council on Environmental Quality

The Honorable Robert G. Card Undersecretary, U.S. Department of Energy

Mr. Phil Cooney Chief of Staff, White House Council on Environmental Quality

Ms. Larisa Dobriansky
Deputy Assistant Secretary for Energy Policy

U.S. Department of Energy



2003 Executive Committee

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Member-At-Large Michael Cyrus President & CEO Energy Merchant Cinergy Corp.

LONG-TERM OBJECTIVES, 2003 GOALS and STRATEGIES

ELECTRIC POWER SUPPLY ASSOCIATION

Long-term Objective I: Achieve effective competition in wholesale and retail power markets nationwide.

2003 Goals

- Enactment of comprehensive electric industry restructuring legislation at the federal level.
- Implementation of regulatory and commercial policies that encourage and support the development of fully competitive regional electric markets.
- 3. Prevention of policies that reimpose legal or regulatory anti-competitive market structures.
- 4. Achievement of environmental policies that enhance competitive markets and the interests of our industry.
- 5. Establishment of comprehensive competitive structures in the states which ensure that customers realize the benefits of competition.

Strategies (not in any order of importance)

- A. Promote the quick transition to optimally sized regional transmission organizations that encompass well-functioning natural supply markets.
- B. Promote the standardization of market design and tariffs in order to effectuate a quick transition to well-functioning energy markets.
- C. Advocate EPSA's positions on electric industry restructuring and competitive markets with federal; state and regional policymakers.
 - D. Support member companies' efforts to advocate in favor of competitive markets and create new opportunities for member company influence.
 - E. Expand EPSA's political contributions program to compliment our legislative strategies and develop additional opportunities to educate and influence Congress.
 - F. Promote the need for adequate supply, clear price signals, and customer choice to counter negative perceptions of competition among federal and state thoughtleaders.

- G. Promote an orderly transition to a state regulatory and legislative regime that provides open and comparable access to retail markets and minimizes burdensome restrictions or regulations on power suppliers.
- H. Advocate comparability of transmission service and market structures that promote the effective and nondiscriminatory use and expansion of the grid.
- Advocate the development of policies to ensure the timely, equitable and efficient interconnection and siting of new generation.
- J. Promote efficient demand response to competitive price signals.
- K. Promote the timely development of commercial and reliability business practices that facilitate fully competitive power supply markets and are subordinate to RTOs.
- L. Advocate the adoption of state, regional, national and international environmental policies that value the environmental contributions made by the competitive power supply industry and enhance competitive opportunities.
- M. Develop and promote an environmental policy that will provide certainty and market-based implementation of federal and state limits to the production of multiple pollutants.
- N. Implement a public affairs program that promotes fully competitive electric power supply markets and the benefits of competition to the consumer.
- O. Work with appropriate pro-competition coalitions to implement public affairs programs and grassroots activities that engender support for competition among the general public.

Long-term Objective II: Lead the advocacy and promotion of the power supply industry.

2003 Goals

- Enhancement of the image and political credibility of the power supply industry, including promotion of the industry's contributions to reliability and consumer benefits
- 2. Expansion of our industry's domestic and international business opportunities.
- Mitigation of federal and state legislation and regulatory policies that perpetuate price controls or adversely impact existing contracts.
- 4. Promotion of adequate electric infrastructure.
- 5. Expansion of member recruitment and retention efforts.

Strategies (not in any order of importance)

- A. Implement and promote an industry code of ethics and sound trading practices.
- B. Cooperate with and support other initiatives that will lead to enhanced confidence in the power supply industry.
- C. Provide a leadership role in other industry stakeholder coalitions to achieve common goals and actively participate in coalition activities.
- D. Develop and distribute educational and outreach materials about our industry and policies to policymakers and stakeholders.
- E. Monitor and aggressively respond to federal or state actions that either repeal PURPA or modify PURPA on a stand-alone basis, or adversely impact existing PURPA contracts.
- F. Monitor and aggressively respond to legislative or regulatory actions that attempt to impose price controls or mitigation on competitive markets or challenge existing contracts.
- G. Where mitigation is imposed, advocate stable before-the-fact procedures that minimize market disruption and uncertainty.
- H. Facilitate members' access to federal, state and international policymakers and the media.

- I. Promote a definition of renewable technologies that is consistent with the PURPA definition.
- J. Advocate the adoption of U.S. policies, including full funding for U.S. export credit agencies that enhance the international development efforts of our industry.
- K. Implement a public affairs program that promotes the contributions of competitive power suppliers, including the use of paid and earned media.
- L. Promote the economic, reliability and environmental benefits of siting, construction and interconnection of generating facilities.
- M. Encourage the development of the transmission and generation infrastructure needed to support competitive markets.
- N. Promote the benefit of EPSA membership to members and potential members.
- O. Assess members' expectations and level of satisfaction.

Long-term Objective III: Provide key expertise and information to the power supply industry.

2003 Goals

- 1. Assistance in identifying and pursuing domestic and international business opportunities.
- 2. Promotion of our industry's operational competitiveness.
- 3. Advancement of efficient and streamlined business practices.

Strategies (not in any order of importance)

- A. Evaluate and screen current and potential activities, particularly programs not related to competitive advocacy.
- B. Monitor initiatives to prescribe marketing, information disclosure, confidentiality and other guidelines for electric power markets.
- C. Advocate tax and accounting policies that facilitate the ability of our industry to compete.
- D. Serve as a clearinghouse of information for and about our industry.
- E. Facilitate participation in industry standard setting.
- F. Improve capability to collect, analyze and disseminate industry data.
- G. Monitor the impacts of regulatory and commercial policies on access to fuels.

EPSA 2002 Committees

LEGISLATIVE AFFAIRS COMMITTEE

The Legislative Affairs Committee is responsible for developing, articulating and implementing the federal legislative agenda of EPSA. The committee oversees the congressional lobbying efforts of the association, drafts testimony, arranges Hill visits and grassroots lobbying efforts, and develops legislative strategy as restructuring legislation develops. The committee also participates in presenting the association's position in a number of other forums, including the Department of Energy (DOE), trade associations, coalitions, and think tanks.

ACCOUNTING WORKING GROUP

The Accounting Working Group provides a forum for members to discuss current accounting policies and practices as they relate to the competitive power business. The working group is a subcommittee of the Legislative Affairs Committee.

TAX POLICY WORKING GROUP

The Tax Policy Working Group is a forum for members to discuss current electric power industry tax policies on a technical level. The group addresses such topics as AMT, state and local property tax impact, project level issues, as well as forthcoming tax legislation and possible EPSA initiatives. The working group is a subcommittee of the Legislative Affairs Committee.

REGULATORY AFFAIRS COMMITTEE

The Regulatory Affairs Committee is responsible for developing and articulating EPSA's positions before regulatory agencies, primarily the Federal Energy Regulatory Commission (FERC). The committee addresses policy issues related to industry restructuring on a proactive basis where possible and responds to Notices of Proposed Rulemaking or Notices of Inquiry from FERC on a range of issues of significance to the competitive power industry. The Committee also addresses a wide range of market implementation issues that impact the ability of power marketers and generators to make sales in a restructured industry. The committee also participates in presenting the association's policy positions in a number of other forums, including DOE, the North American Electric Reliability Council (NERC), trade associations, and think tanks.

ENERGY STANDARDS WORKING GROUP

The Energy Standards Working Group provides a forum for discussing NERC and reliability related issues. The group facilitates contacts with NERC staff on committee nominations, project priority surveys and meeting agenda preparation and review. In addition, the group has become a key focal point for strategic discussions associated with the consideration for the GISB proposal for a new Energy Industry Standards Board, as well as related ongoing push for fundamental structural within NERC. The working group coordinates with EPSA's legislative staff to review and prepare recommendations on pending reliability legislation and is a subcommittee of the Regulatory Affairs Committee.

NATURAL GAS ISSUES WORKING GROUP

The Natural Gas Issues Working Group addresses gas regulatory issues of importance to merchant generators, including pipeline service issues and supply adequacy. The working group is a subcommittee of the Regulatory Affairs Committee.

STATE ISSUES COMMITTEE

The State Issues Committee coordinates EPSA's activities in state restructuring proceedings and legislative activities. This committee is responsible for monitoring state proceedings and activities; participating in the National Association of Regulatory Utility Commissioners (NARUC), the National Council of State Legislatures (NCSL), and other national organizations of state officials; and developing and articulating the association's policy positions in precedent-setting state regulatory and legislative proceedings. This committee identifies opportunities for the association to coordinate with and assist members and state and regional partners.

ENVIRONMENTAL ISSUES COMMITTEE

The Environmental Issues Committee develops and articulates EPSA's positions on environmental policy and regulatory issues before the Environmental Protection Agency (EPA) and other entities. The committee addresses environmental policy issues related to industry restructuring on a proactive basis and responds to proposed rulemakings from EPA on key industry issues. In conjunction with other key EPSA committees, the committee develops, articulates and implements EPSA's positions and strategies on legislative issues involving environmental issues.

INTERNATIONAL ISSUES COMMITTEE

The International Issues Committee develops and articulates EPSA's positions on international development opportunities. The committee educates members about funding sources and U.S. government export support programs; works with export credit agencies and the multi-lateral banks; showcases the international development expertise of the members; and provides opportunities for members to meet with energy regulators and

executives from other countries. The committee advocates the full funding of the U.S. export credit agencies.

RENEWABLES COMMITTEE

The Renewables Committee coordinates EPSA's activities on the issues unique to renewable resources. In coordination with other committees, this committee develops and articulates EPSA's policies on issues of importance to renewable project developers.

PUBLIC AFFAIRS COMMITTEE

The Public Affairs Committee is responsible for communicating EPSA's messages to the audiences it needs to reach to be effective. In conjunction with the Legislative Affairs Committee, the committee orchestrates a public affairs campaign designed to persuade Congress to act on the association's federal legislative agenda. The committee also oversees media relations activities intended to advance EPSA's other policy objectives. The committee directs the production, marketing, and distribution of the association's printed materials and coordinates the continued development of "EPSA Online," the association's Internet web site.

ETHICS COMMITTEE

The Ethics Committee is responsible for periodically reviewing the Code of Ethics and Sound Trading Practices and recommending any needed changes. In addition, the Committee will take up further discussions of enforcement issues, as well as issues related to the Code of Ethics, such as additional outreach efforts, filing it in various proceedings or training programs.



EPSA Senior Staff

Lynne H. Church, President

As EPSA president, Church is responsible for the overall management of the association, including programs in the areas of legislative affairs, regulatory policy development and public affairs. Church also serves as a member of the association's executive committee.

Prior to joining EPSA, Church was a partner in the Washington D.C. energy law firm of Grammer Kissel Robbins Skancke & Edwards. She counseled clients in the electric and natural gas industries on how to take advantage of opportunities created by increased competition in those industries.

Prior to her law practice, Church served in several positions, including treasurer and assistant secretary, with Baltimore Gas & Electric Co. At BGE, Church was responsible for all finance and treasury functions for the utility and non-regulated subsidiaries. Earlier in her tenure at BGE, she was the associate general counsel in charge of the company's legal representation on natural gas, environmental, nuclear, and telecommunications regulatory issues before the Federal Energy Regulatory Commission (FERC) and other agencies.

Earlier in her career, Church served as associate general counsel for rulemaking and policy coordination at FERC and as director of the office of natural gas at the Department of Energy.

Church holds a J.D. from the National Law Center of George Washington University. She received a bachelor's degree from Goucher College.

Eugene F. Peters, Vice President of Legislative Affairs

Gene Peters serves as the vice president of legislative affairs for the Electric Power Supply Association. He manages the association's federal legislative relations program, with a primary emphasis on electric industry restructuring. He also serves as EPSA's principal liaison with organizations and advocacy groups involved in the restructuring debate.

Previously, Peters was EPSA's director of legislative affairs and prior to that the senior manager of policy, responsible for crafting consensus policy positions for the independent electric power industry. Peters served in a similar position at the National Independent Energy Producers (NIEP).

Peters served as senior legislative assistant to former Sen. Bill Bradley of New Jersey before moving to NIEP. As a staff member for ten years, Peters handled a wide variety of issues for the Senator. In particular, he provided the analysis for the Senator's work on the Senate Energy and Natural Resources Committee.

Other career positions include work for the U.S. Synthetic Fuels Corporation, the Harvard

Energy and Environmental Policy Center, and the Energy and Power Subcommittee of the U.S. House Commerce Committee. Peters holds a bachelor's degree, with honors, from Princeton, as well as graduate degrees in engineering and public policy from Stanford University and Harvard University respectively. He also has received both Fulbright and National Science Foundation Fellowships.

Julie Simon, Vice President of Policy

Julie Simon serves as vice president of policy for the Electric Power Supply Association. She is responsible for all aspects of regulatory and legislative policy development including liaison with administration officials, regulators, lawmakers on Capitol Hill, and colleagues at related energy and environmental organizations. She is an attorney with extensive experience dealing with legal and policy issues in the energy arena.

Simon served in a similar position for the Electric Generation Association (EGA) as the director of policy. She was responsible for all association policy development.

Before joining EGA, Simon was a partner in the Washington D.C. office of Ater, Wynne, Hewitt, Dodson & Skerritt. Simon focused on cogeneration and energy project development, as well as natural gas and electric industry restructuring, and represented clients before the Federal Energy Regulatory Commission (FERC) and the California Public Utilities Commission.

Simon was an Associate with the Washington D.C.-based law firm of John, Hengerer & Esposito from 1987 to 1988, dealing with hatural gas transportation and contracting issues and representing clients before the FERC and the Economic Regulatory Administration.

Simon served as the general counsel for the Chugach Electric Association in Anchorage, Alaska from 1984 to 1987. She holds a J.D. from Golden Gate University, School of Law and a bachelor's degree from the University of California at Berkeley.

Mark Stultz, Vice President of Public Affairs & Marketing

Mark Stultz serves as the vice president of public affairs and marketing for the Electric Power Supply Association. He directs a comprehensive national public affairs program that positions the industry as an advocate of the benefits of competition for all electricity customers. He is responsible for an aggressive media relations program as well as overseeing the writing, design, and printing of all the association's publications.

Before joining EPSA, Stultz was responsible for directing electronic communications and related membership programs at the American Gas Association (A.G.A.).

While at A.G.A., Stultz managed the expansion of the association's electronic networks and was responsible for identifying, deploying and promoting other member service and communication technologies, as well as developing the appropriate editorial content and

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programming for these services. He consolidated the organization's previous on-line services and managed the successful launch, development and maintenance of an upgraded web site. He also administered the association's satellite teleconferencing and digital videoconferencing programs.

From 1991 to 1996, he served as A.G.A.'s manager of public relations programs and was responsible for the development and implementation of full range of public and media relations strategies, with special responsibility for outreach to the energy trade press and to the broadcast news media.

Prior to joining A.G.A., Stultz spent seven years as a television reporter and anchorman, covering such developments as the restart of Three Mile Island and operating controversies at the Limerick, Peach Bottom and Calvert Cliffs nuclear generating stations. He also spent several years covering the Pennsylvania Public Utility commission as a reporter and editor with United Press International.

A senior fellow at Bethany College in Bethany, W.V., Stultz has a bachelor's degree in communications.

Board Members

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01/02/2003

State & Regional Partners

ARIPPA

California Cogeneration Council Cogeneration Association of California Colorado Independent Energy Association Competitive Power Coalition of New England

Electric Power Generation Association Energy Michigan Inc.

Florida Industrial Cogeneration Association Gulf Coast Power Association Idaho Independent Energy Council Independent Energy Producers of California

Independent Energy Producers of Maine Independent Energy Producers of New

Independent Power Producers of New York Independent Power Producers' Society of Ontario

Michigan Independent Power Producers Association

Mid-Atlantic Power Supply Association Midwest Cogeneration Association Midwest Independent Power Suppliers Coordination Group Northeast Energy and Commerce

Association

Vermont Independent Power Producers Association

Virginia Independent Power Producers Inc. Western Power Trading Forum



Competitive Power Supply Industry Facts

Updated November 2002

A snapshot of this young but increasingly prominent segment of the energy industry:

Power Generation

the face of the electric power industry is changing. No longer is it made up exclusively of regulated monopolies created to do it all - generate, transmit, distribute and sell power within a clearly defined geographic region. Now, a significant portion of the industry is made up of companies that must compete in order to survive. particularly in the generation and trading of power as a commodity, as well as the wholesale and retail marketing of energy and energy services. These changes. have given rise to a wholeclass of competitive power suppliers, enterprises that didn't even exist as recently as a decade ago.

In 2001, competitive power suppliers generated 1,116 billion kWh of the 3,777 billion kWh in total U.S. output, 42 percent higher than in 2000.

(Source: EIA Electric Power Monthly, March 2002)

With the development of new merchant power plants, the purchase of existing utility plants, and the transfer of previously rate-regulated plants to competitive corporate affiliates. EPSA reports that competitive power suppliers own and operate approximately 36 percent of the nation's installed generating capacity as of the end of 2001. In July 2002, total U.S. net generation of electricity was 380 billion kWh. Competitive power suppliers generated 131 billion kWh of sales in the market, or 34 percent of total generation for the month, the most recent reported. (Source: EPSA and EIA Electric Power Monthly, October 2002)

Since 1997, a total of 121,200 MW of utility generation capacity totaling more than \$24 billion has been or is scheduled to be sold to competitive suppliers. (Source: EPSA)

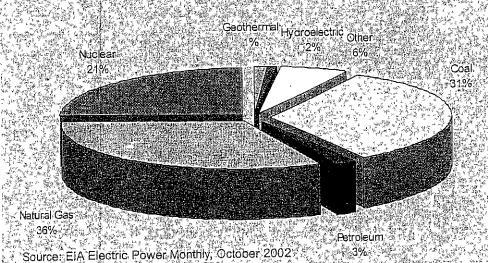
Number of announced merchant MW announced by NERC region:

ECAR	-55,147
ERCOT	32,680
FRCC	13,863
MAAC	. 15,634
MAIN -	33,979
MAPP	3,279
NPCC	28,320
SERC	80,636
SPP	6,878
WSCC	72,606
Total	343,022MW

(Source: EPSA Announced M.P. Matrix, November 2002)

As of November 2002, competitive power suppliers have announced the potential development of 343,022 MW of proposed merchant power plant capacity to be completed by 2008. (Source: EPSA Announced Merchant Plant Matrix)

U.S. Competitive Power Suppliers Net Generation 2002



Competitive Power Supply Industry Facts

compiled by the Electric Power Supply Association. Updated November 2002.

Competitive Generation

During 2001, U.S. nonutility generating facilities generated 1,116 billion kWh of electricity, or 30 percent of the total U.S. output. (Source: EIA Electric Power Monthly, March 2002)

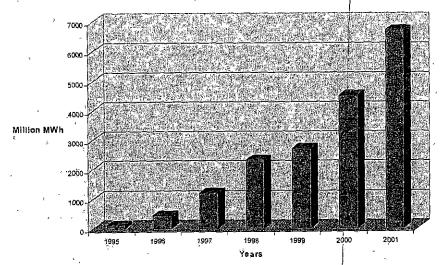
The profile of the U.S. electric power generation industry is changing rapidly, with ownership shifting from regulated utilities to competitive suppliers. The com-

petitive supplier share of installed capacity has increased almost four-fold in less than five years, rising from 70.3 GW in 1997 to 319.5 GW in 2001. During 1997-2001, the amount of competitive generation has grown from 8.5 percent of total U.S. capacity in 1997, to 35.6 percent of the total in 2001. (Source: EPSA Industry Review, "The Changing Face of U.S. Power Suppliers," November 2001)

Wholesale Marketing

Total wholesale transactions by power marketers in 2001 reached more than 6.7 billion megawatt-hours, more than double the 1999 total. (Source: McGraw Hill Power Markets Week, March 2002)

Power Marketer Total Wholesale Sales



Source McGraw Hill

Top 10 wholesale marketers, by market share, for 2002:

American Electric Pwr8.47%	
Aquila Energy Mktg6.00%	
El Paso Merchant Energy.5.61%	
Duke Energy5.59%	
Reliant Energy5.59%	
Williams Energy5.13%	
Mirant Energy5.02%	
PG&E Energy4.50%	
*Constellation4.11%	
Exelon3.40%	
(Source: Power Marketer Sales	
Statistics, McGraw Hill, October 2002)	

Retail Sales

Retail electricity sales by electric utilities and power marketers totaled 3.385 billion kwh in 2001. A successful model for a statelevel "customer choice" program exists in Pennsylvania, where electric competition has saved customers more than \$4 billion in electricity costs; more than 1 million people have cumulatively shopped for power; and more than 550,000 are currently shopping. More than 40,000 jobs are expected to be created by electric choice in the state by 2005. Furthermore, nearly 120,000 Pennsylvanians now use green power -- more than any other state. (Source: EIA Electric Power Monthly, March 2002 and Pennsylvania Public Utility Commission)

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